

Dear FCC:

I strongly support the general concepts proposed in RM-10413 of allowing Novice and Technician Plus licensees access to a broader range of frequencies on the 80, 40 and 15 meter bands for Narrowband modes while expanding frequency allocations for Wideband modes for higher class licensees. However, I question whether the ARRL proposal goes far enough in providing additional Wideband spectrum.

Listed below are the percentage of HF spectrum by band currently allocated exclusively for Narrowband modes compared with proposed allocation changes if proposed RM Petitions 10352 (160 meters) and 10413 (80, 40 and 15 meters) are adopted (other bands included for reference):

NARROWBAND ALLOCATIONS BY BAND

Band	Current %	Proposed %	Proposal	Narrowband/Total (kHz)
160	0	20	RM-10352	40 / 200
80	50	45	RM-10413	225 / 500
40	50	41.7	RM-10413	125 / 300
30	100	100	No change	50 / 50
20	42.9	42.9	No change	150 / 350
17	42.0	42.0	No change	42 / 100
15	44.4	44.4	RM-10413	200 / 450
12	40	40	No change	40 / 100
10	17.6	17.6	No change	300 / 1700

As a co-sponsor of RM-10352, I believe 40 kHz or 20% of the 160 meter band is adequate for Narrowband modes on the Topband due to activity levels and other considerations. However, I question whether the above Narrowband allocations for 80 and 15 meters may be larger than necessary and given the higher Wideband activity levels on these bands. 40 meters is a special case due to ITU Region 1 & 3 broadcast interference above 7100 which may best be revisited after upcoming WRC 2003 decisions about a common worldwide amateur allocation for 40 meters.

I am a strong advocate of Narrowband modes being a superior means of communicating under adverse conditions including the interference, noise

and fading so common on the lower HF frequencies, and I strongly support the ARRL's proposed expansion of Narrowband frequencies for Novice and Technician Plus licensees. However, I do urge the Commission to carefully consider expanding the proposed Wideband allocations for 80 and 15 meters.

Respectfully submitted,

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